

State of California  
State and Consumer Services Agency  
California Building Standards Commission  
2525 Natomas Park Dr., Suite 130  
Sacramento, CA 95833

Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008  
TITLE 24, CCR, PART 11, CALIFORNIA GREEN BUILDING STANDARDS CODE**

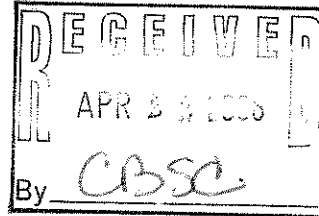
Deadline: May 12, 2008

Date: April 21, 2008

From: Dan Harrington

Organization: EcoTimber, Inc.

Address: 1611 Fourth St., San Rafael, CA 94901



I/We **do not** agree with the Agency proposed modifications As Submitted on Section No.705.2.1 - "Certified wood products", and request that this section or reference provision be recommended **Disapproved** by the proposing state agency.

**Suggested Revisions to the Text of the Regulations:**

Delete standards organizations 2 through 5, leaving only Forest Stewardship Council (FSC) Principles and Criteria as an approved standard, or delete the entire paragraph 705.2.1.

**Reason:**

Health & Safety Code Section 18930 (a) (3): The public interest requires **rejection** of the building standard **as written**.

The people of California deserve to have confidence in the way our national and state forests and timber lands are being managed. At this time, only the FSC program provides credible oversight, obligatory chain of custody monitoring, and key elements of sustainability such as the prohibition of the conversion of forest ecosystems into ecologically-impooverished tree plantations. For example, under the Sustainable Forestry Initiative (SFI) standard, Sierra Pacific Industries is allowed to clear cut vast areas of forest lands up and down the State, destroying local wildlife habitat and polluting streams with soil runoff. They are then allowed to plant a monoculture of fast-growing trees which are more susceptible to fire and disease. Under the SFI standard, Maxam Corporation was allowed to rapidly clear cut large areas of Pacific Lumber Company's redwood forests, destroy a formerly well-run company, put many of its employees out of work, and is now in bankruptcy court in Texas. This is not sustainable behavior. The SFI program has a long way to go before it can be trusted. The only forest certification program that currently has credibility in the environmental community (with groups such as NRDC, Sierra Club, etc.) and with the public at large is FSC. FSC is also the only forest certification system recognized by the USGBC, an organization that has done extensive study around this issue.